

**UNITED STATES DISTRICT COURT
OF PUERTO RICO
CASE NO. 22-CR-00342-SCC**

UNITED STATES OF AMERICA,
Plaintiff,
v.

MARK T. ROSSINI,
Defendant.

UNOPPOSED MOTION TO TRAVEL

Mark Rossini (“Mr. Rossini”), through undersigned counsels, respectfully requests that Your Honor allow him to travel to Podgorica, Montenegro from January 28, 2024 to February 1, 2024 to attend business meetings.

1. On October 25, 2023, Your Honor granted Mr. Rossini’s request to reside in Madrid, Spain, from November 28, 2023 through the first week of March 2024, with permission to travel to France and Switzerland, to undergo cancer treatment and tend to other matters. (DE 365).
2. With the Court’s permission, Mr. Rossini has traveled six times without incident.¹
3. Mr. Rossini has business meetings scheduled for January 29-31, 2024, in

¹ To Spain, from September 23, 2022 to October 19, 2022, to receive cancer treatments; (DE 98); To Spain, from December 20, 2022 to January 25, 2023, also for medical treatment. (DE 141); To Spain, from February 27, 2023 to March 13, 2023, for cancer treatment. (DE 166); To Spain, from April 4, 2023 to May 13, 2023, for cancer treatment. (DE 182); To Spain, from September 14, 2023 to October 10, 2023, for cancer treatment (DE 259); and To London, from November 25, 2023 to November 30, 2023, to meet with his counsel (417).

Podgorica, Montenegro.

4. Details regarding Mr. Rossini's travel itinerary and contact information will be provided to Mr. Rossini's assigned probation officer, and to the Court under seal upon request.
5. Assistant U.S. Attorneys Nicholas Cannon and Ryan Crosswell do not object to this request.

WHEREFORE, Mr. Rossini respectfully requests that Your Honor allow him to travel to Podgorica, Montenegro from January 28, 2024 to February 1, 2024 to attend business meetings.

Respectfully submitted,

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Attorneys for Mark T. Rossini

CERTIFICATE OF SERVICE

I certify that on January 24, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, causing a copy to be served on counsel of record.

/s/ Juan J. Michelen
Juan J. Michelen